

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

**IN RE:**

**Marcus Xavier Robertson  
xxx-xx-2040**

**Debtor and Respondent**

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**CASE NO: 3:16-bk-02899**

**RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

Comes Marcus Xavier Robertson, by and through counsel, and hereby responds to the Trustee's Motion to Dismiss. Response deadline is June 22, 2016 and the hearing date is July 6, 2016.

In support of the response, respondents would show as follows:

1. Debtor filed for Chapter 13 on April 22, 2016.
2. Debtor's 341 hearing has been continued to July 15, 2016 and is pending confirmation.
3. The Debtor's employer was sent a payroll deduction order but was slow to respond. The Debtor would show the payroll deduction order is in place and payments are flowing to the Trustee as of the date of this response.

**WHEREFORE, PREMISES CONSIDERED,** Marcus Xavier Robertson pray for the Trustee's Motion to Dismiss be denied.

Respectfully submitted,

**/s/L.G. Burnett, Jr.**

**L.G. Burnett, Jr. Reg. #6463**

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**CERTIFICATE OF SERVICE**

I hereby certify on June 22, 2016 that a true and correct copy of the foregoing has been sent through the CM/ECF system to the United States Trustee and to Henry Hildebrand III, Chapter 13 Trustee.

**/s/L.G. Burnett, Jr.**

**L.G. Burnett, Jr., Esq.**